

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 929.294.2540

DIRECT EMAIL jdabbs@kaplanhecker.com

April 15, 2024

BY ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Application granted. The status conference is adjourned to May 23, 2024 at 3:00 p.m. Time is excluded until May 23, 2024, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

SO ORDERED.

Re: *United States v. Robert Nunez et al.*, 21 Cr. 246 (RA)



Ronnie Abrams, U.S.D.J.

April 16, 2024

Dear Judge Abrams:

I represent Robert Nunez, a defendant in the above-captioned case, and write to request an adjournment of the status conference currently scheduled for this Friday, April 19, 2024, at 12:30 p.m. The government consents to this request. Specifically, we seek an adjournment of approximately 30 days to allow the parties to continue to explore a potential pretrial resolution of this matter.

Should the Court grant this request, the defendant consents to the exclusion of time under the Speedy Trial Act until the rescheduled conference date because the exclusion will permit the parties to continue discussing a potential pretrial resolution of this case.

We thank the Court for its consideration of this request.

Respectfully submitted,



Jenna M. Dabbs

KAPLAN HECKER & FINK LLP
350 Fifth Avenue, 63rd Floor
New York, New York 10118
Telephone: (212) 763-0883
jdabbs@kaplanhecker.com

Cc: Assistant United States Attorneys Danielle Kudla and Alexander Li